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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PROTECTION, *et al.*,

Plaintiffs,

v.

THE LIFETIME VALUE CO. LLC., *et al.*,

Defendants.

Civil Action No. No. 24-cv-4850-HB

Honorable Harvey Bartle, III, U.S.D.J.

**DEFENDANTS' MOTION FOR
ADMISSION *PRO HAC VICE* OF
ELIZABETH MILBURN, ESQ.**

Pursuant to Local Civil Rule 101.1(c), Christopher A. Rojao, counsel to the Lifetime Value Co. LLC, BeenVerified, Inc.¹, BeenVerified, LLC, NeighborWho LLC, the NumberGuru,

¹ BeenVerified, Inc. is no longer in existence.

LLC, PeopleLooker LLC, PeopleSmart LLC, Ownerly, LLC (collectively the “Defendants”), and a member of the New Jersey Bar, moves for the admission *pro hac vice* of Elizabeth Milburn, Esq.

Ms. Milburn will be associated with me in the defense of this matter. I will be responsible for Ms. Milburn’s conduct during her admission *pro hac vice* and will ensure that *pro hac vice* counsel will comply with Local Civil Rule 101.1(c).

I, or another lawyer at McCarter & English, LLP, admitted to practice before this Court, will make all court appearances with *pro hac vice* counsel, unless excused by this Court. I, or another lawyer at McCarter & English, LLP, admitted to practice before this Court, will sign all pleadings, briefs and other papers filed with the Court.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Ms. Milburn’s Certification and Order are submitted herewith.

By: /s/ Christopher A. Rojao

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